

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No.
)	
FIVE THOUSAND, FOUR HUNDRED)	
AND FORTY-TWO DOLLARS IN U.S.)	
CURRENCY (\$5,442.00),)	
)	
Defendant.)	

VERIFIED COMPLAINT OF FORFEITURE

COMES NOW, Plaintiff, the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Stephen Casey, Assistant United States Attorney, for said district, and for its Verified Complaint for Forfeiture states as follows:

NATURE OF THE ACTION

1. This is a civil action *in rem* brought by the United States of America seeking forfeiture of all right, title, and interest in the above-captioned defendant property pursuant Title 21, United States Code, Section 881(a)(6).

2. The defendant property was seized by law enforcement on or about April 23, 2019, and is described more fully as five thousand, four hundred and forty-two dollars in U.S. currency (\$5,442.00) (the “defendant property”).

JURISDICTION AND VENUE

3. The Court has jurisdiction over this action pursuant to Title 28, United States Code, Sections 1345, 1355, and 1395.

4. Venue is proper pursuant to Title 28, United States Code, Section 1355(b)(1)(A) because the acts and omissions giving rise to forfeiture took place in the Eastern District of Missouri. Venue is also proper pursuant to Title 28, United States Code, Section 1395(b) because the defendant currency was seized in the Eastern District of Missouri.

STATUTORY FRAMEWORK

5. Title 21, United States Code, Section 881(a)(6) authorizes the civil forfeiture of “all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter.”

FACTS GIVING RISE TO THE FORFEITURE

6. On April 18, 2019, Robert Eugene Williams (“Williams”) was indicted in the Eastern District of Missouri, charging the offenses of Drug Trafficking and Conspiracy to Commit Drug Trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

7. On April 23, 2019, law enforcement officers arrested Williams at his residence.

8. Yolanda Crawford (“Crawford”), the girlfriend of Williams, allowed the officers to enter the residence. Williams entered the living room area and was arrested.

9. Officers conducted a security sweep of the residence and detected the smell of fresh marijuana in the rear living area of the residence. They also observed U.S. Currency lying on an entertainment cabinet.

10. After the security sweep, officers spoke with Crawford and asked for consent to search the residence. Crawford gave consent to search the residence and signed a form giving

consent.

11. In the rear living area of the residence, officers located three orange five-gallon buckets sitting on the floor in front of the entertainment center. Officers opened the buckets. Two were empty but smelled strongly of marijuana. The third bucket contained eight plastic bags of marijuana. The third bucket also contained folded U.S. Currency.

12. The marijuana, the U.S. Currency on the entertainment center and the U.S. Currency in the third bucket were seized by the officers and the official count of the U.S. Currency was \$5,442.00 U.S. Currency.

COUNT ONE – FORFEITURE
21 U.S.C. § 881(a)(6)

13. The United States incorporates by reference the allegations set forth in Paragraphs 1 to 12 above as if fully set forth herein.

14. The defendant property is bulk U.S. currency that was discovered by law enforcement officers in a bundle and concealed in a bucket with marijuana, consistent with drug trafficking. Williams has a criminal history related to narcotics possession and distribution.

15. Based on the foregoing, the defendant currency is subject to forfeiture pursuant to Title 21, United States Code, Section 881(a)(6) as money furnished or intended to be furnished in exchange for a controlled substance, as proceeds traceable to such an exchange, and as money to be used to facilitate a violation of the Controlled Substances Act.

PRAYER FOR RELIEF

WHEREFORE, the United States of America prays that a Warrant for Arrest be issued in rem for the defendant currency and the defendant currency be condemned and forfeited to the United States of America, in accordance with the provisions of law; and that the United States of

America be awarded its costs in this action, and have such other relief as provided by law and the nature of the case may require.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Stephen Casey
STEPHEN CASEY, #58879MO
Assistant United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri 63102

VERIFICATION

I, Joseph R. Somogyi, hereby verify and declare under penalty of perjury that I am a Task Force Officer with the Drug Enforcement Administration, that I have read the foregoing Verified Complaint and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge and belief.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Task Force Officer with the Drug Enforcement Administration.

Pursuant to 28 U.S.C. ' 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 10-16-2019

(date)

A handwritten signature in black ink, appearing to read 'X-TFO' followed by a stylized signature, is written over a horizontal line.

JOSEPH R. SOMOGYE
Task Force Officer
Drug Enforcement Administration